

**ATTACHMENT A**

**AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A SEARCH WARRANT**

I, Frank H. Figgers, III, Task Force Officer, United States Postal Inspection Service, having been duly sworn under oath, state as follows:

1. Your affiant is a certified police officer employed full time with the Virginia State Police and holds the rank of Special Agent. I am currently assigned as a Task Force Officer with the United States Postal Inspection Service (“USPIS”) assigned in the Roanoke, Virginia Domicile. I am authorized to investigate criminal and civil matters related to the United States Postal Service and the mails; serve warrants and subpoenas; make arrests; carry firearms; make seizures of property; administer oaths; and perform such other official duties as may be established by the Chief Postal Inspector. I have been employed as a sworn officer with the Virginia State Police since January 1989 and have worked the drug interdiction arena with the Virginia State Police since 2003. My work has included highway drug interdiction and parcel interdiction at other commercial parcel businesses. I have received formal training in conducting criminal investigations into drug trafficking and money laundering organizations that utilize the United States Postal Service (“USPS”). During my tenure as a Special Agent, I have conducted and participated in numerous investigations of criminal activity that have violated both federal and state law.

2. I know based on training and experience that the U.S. Mail is often used by drug trafficking organizations to transport controlled substances and proceeds from the sale of controlled substances. I know based on training and experience that USPS Priority Mail and

Priority Mail Express are commonly used to transport controlled substances, and drug trafficking proceeds, because drug traffickers can track parcels, control dispatch times and locations, and have a guarantee of delivery in one to three days.

3. This affidavit is submitted in support of an application for a search warrant of a USPS Priority Mail 2-Day parcel bearing tracking number “9505 5162 1416 1195 7061 67” for controlled substances and/or the proceeds from drug trafficking. The parcel (hereafter referred to as Parcel #1) is described as follows:

- a. Addressee: Jacara Taylor, 2012 Tinker Drive NE, Roanoke, VA 24012
- b. Return Address: Jacob Saez, 808 N. Orange Drive, Los Angeles, CA 90038
- c. Postage Affixed: Origin: Los Angeles 90048, Postage: \$21.90, Date: Jul 14, 21
- d. Tracking Number: 9505 5162 1416 1195 7061 67 (Parcel #1)
- e. Description: White cardboard box bearing dimensions 12.25” x 12.25” x 6”
- f. Weight: 3 pounds 12.8 ounces

4. On July 16, 2021, your affiant identified Parcel #1 as a suspected drug parcel and requested postal management re-route Parcel #1 to the USPS for further examination. On July 19, 2021, your affiant took custody of Parcel #1. Parcel #1 was mailed from Los Angeles, California, a known source area for parcels containing controlled substances mailed into the Western District of Virginia. Parcel #1 is a white cardboard box bearing a USPS Priority Mail 2-Day postage paid label. The return address is listed as Jacob Saez, 808 N Orange Dr., Los Angeles, California 90038. The recipient is listed as Jacara Taylor, 2012 Tinker Dr. NE, Roanoke, Virginia 24012. A photograph of Parcel #1 is attached as Exhibit #1.

5. A search of postal records revealed nineteen (19) prior USPS Priority Mail parcels were mailed from California to the destination address 2012 Tinker Drive address since August

2020. The parcels ranged in weight from two (2) to fifty (50) pounds. Four (4) of the California parcels were mailed from Los Angeles, California.

6. I utilized CLEAR to conduct searches for information related to Parcel #1. Your affiant was able to determine through CLEAR that a D. T. resides at 2012 Tinker Drive NE, Roanoke, Virginia 24012. However, a CLEAR search for the name of the addressee, “Jacara Taylor,” was not able to be associated to destination address 2012 Tinker Drive NE, Roanoke, Virginia 24012. The name “Jacara Taylor” could not be associated with any address in Roanoke or the Commonwealth of Virginia. The listed sender name, “Jacob Saez”, was unable to be associated with the return address. Based on your affiant’s training and experience, this type of mailing pattern with the use of a fictitious name can be indicative of drug trafficking through the U.S. Mail.

7. On July 19, 2021, your affiant requested a narcotic detection canine from the Virginia State Police (VSP). Trooper Goins, and his narcotic detection canine, “SHEA,” responded to the USPS Roanoke Processing and Distribution Center located at 419 Rutherford Avenue NE, Roanoke, Virginia 24022. Parcel #1 was placed in a blind parcel line-up and subjected to an exterior search by Canine “SHEA.” Trooper Goins advised your affiant that Canine “SHEA” positively alerted to Parcel #1 at approximately 8:50 a.m. According to Trooper Goins, this positive alert meant Canine “SHEA” detected the odor of an illegal drug emanating from Parcel #1. A supporting affidavit of the narcotics detection training completed by Trooper Goins and Canine “SHEA” is provided as Exhibit #2.

8. At this time, Parcel #1 is located at the USPIS-Roanoke Domicile in the Western District of Virginia. The parcel has been maintained unopened, in my custody, pending application for a search warrant.

9. Based on the facts set forth in this affidavit, I respectfully submit that probable cause exists to believe that the USPS Priority Mail 2-Day parcel bearing tracking number “9505 5162 1416 1195 7061 67,” addressed to “Jacara Taylor, 2012 Tinker Dr. NE, Roanoke, Virginia 24012,” bearing a return address of “Jacob Saez, 808 N. Orange Dr., Los Angeles, California 90038,” contains controlled substances, and/or the proceeds which are evidence thereof, and/or contraband, in violation of Title 21, United States Code, Sections 841(a)(1) and 843(b).

Frank H. Figgers, III  
Frank H. Figgers, III  
Task Force Officer, USPIS

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by reliable electronic means; specifically, by telephone, on the 20th day of July 2021.

Robert S. Ballou  
The Honorable Robert S. Ballou  
United States Magistrate Judge  
Western District of Virginia